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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:22-CR-00401-JD
Plaintiff,)	
v.)	STIPULATION TO SET STATUS CONFERENCE
JACE WONG,)	FOR FEBRUARY 27, 2023 AND EXCLUDE TIME
a/k/a Robyn Wong)	FROM DECEMBER 5, 2022 TO FEBRUARY 27,
Defendant.)	2023 AND [PROPOSED] ORDER

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Jace Wong, that the status conference be rescheduled for February 27, 2023, and that time be excluded under the Speedy Trial Act from December 5, 2022 through February 27, 2023.

The status conference scheduled for December 5, 2022 was not held since the defendant was not brought to Court. The government and counsel for the defendant agree that the status conference should be rescheduled for February 27, 2023, and that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until February 27, 2023 will allow for the effective preparation of counsel. *See* 18 U.S.C.

STIPULATION TO EXCLUDE TIME AND ~~[PROPOSED]~~ ORDER
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§ 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from December 5, 2022 through February 27, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: December 5, 2022

/s/
KELSEY C. DAVIDSON
Assistant United States Attorney

DATED: December 5, 2022

/s/
DOUGLAS HORNGRAD
Counsel for Defendant Jace Wong

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from December 5, 2022 through February 27, 2023 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from December 5, 2022 to February 27, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that a status conference be set for February 27, 2023, and the time from December 5, 2022 through February 27, 2023 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 12/6/22


JAMES J. DONATO
United States District Judge